social sciences

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Forced Fraud: The Financial Exploitation of Human Trafficking Victims †

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Abstract

Human trafficking, a grave violation of human rights, frequently intersects with financial crimes, notably identity theft and coercive debt accumulation. This creates complex challenges for victims, survivors, and law enforcement. Victims of human trafficking are often coerced and/or threatened into committing various forms of crime, referred to as "forced criminality." In recent years, this trend of criminality has moved from violent crimes to financial crimes and fraud, including identity theft, synthetic identity fraud, and serving as money mules. This phenomenon, termed "forced fraud", exacerbates the already severe trauma experienced by victims (referred to as both victims and survivors throughout, consistent with trauma-informed terminology) trapping them in a cycle of financial instability and legal complications. Traffickers often coerce their victims into opening credit lines, taking out loans, or committing fraud all in their own names, leading to ruined credit histories and insurmountable debt. These financial burdens make it extremely difficult for survivors to rebuild their lives post-trafficking. This paper explores the mechanisms of forced fraud, its impact on survivors, and the necessary legislative and financial interventions to support survivors. By examining first-hand accounts and social and policy efforts from a range of sources, this paper highlights the urgent need for comprehensive support systems that address both the immediate and long-term financial repercussions of human trafficking.

Keywords: fraud; human trafficking; victim-centered justice; forced criminality; money laundering; survivor advocacy

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Academic Editor: Georgios Antonopoulos

Received: 21 February 2025
Revised: 25 May 2025
Accepted: 4 June 2025
Published: 23 June 2025

Citation: Schidlow, Michael. 2025. Forced Fraud: The Financial Exploitation of Human Trafficking Victims. *Social Sciences* 14: 398. https://doi.org/10.3390/socsci14070398

1. Overview

Human trafficking is an egregious violation of human rights, affecting millions worldwide. It transcends borders, socioeconomic statuses, and demographics, making it a pervasive and complex issue. Traffickers exploit their victims not only for labor and sexual services but also for various financial crimes. This dual victimization, being trafficked and coerced into committing fraud, adds layers of complexity to the issue, making it crucial for law enforcement, policymakers, and advocacy groups to understand and address these connections comprehensively. This chapter explores the intricate relationship between human trafficking and financial crime, advocating for a survivor-centered approach to justice and recovery.[1]

At a high level, human trafficking is defined as the "recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery" (U.S. Congress 2000). Aggregating the commentary from the UNODC into a clearer framework, trafficking is the action and means undertaken upon victims for the purpose of exploitation (UNODC 2009).

As odious as human trafficking and modern slavery are in and of themselves, these harms are often severely exacerbated by forms of "secondary" exploitation of the victims.[2] Specifically, the human trafficking ecosystem is heavily reliant on financial services to place, layer, and integrate the proceeds of the crime, as well as to facilitate the ongoing schemes needed to perpetuate them. Often times, in addition to the physical, sexual, and mental exploitation, victims of human trafficking are also subject to ongoing and complex financial exploitation. These victims are not only exploited physically but also financially, as traffickers leverage their identities to perpetrate various forms of fraud. Understanding the multifaceted ways in which trafficking victims are coerced into financial crimes is essential for developing effective interventions and support mechanisms. This chapter delves into these complexities, highlighting the need for a compassionate and comprehensive approach to addressing the nexus between human trafficking and financial crime.

Traffickers frequently coerce, deceive, threaten, or enroll their victims unknowingly into opening credit lines or taking out loans in their names, leading to substantial debt and damaged credit histories. The same may be said of consumer banking products, personal credit cards, and other commonplace banking products. Those victim's accounts are often used as so-called money mule and funnel accounts. In tandem, the victims' identifiers and consumer products may be used for a range of first-party frauds, albeit executed by a third party. In those cases, their exploiters use those products to commit financial crimes. Alternatively, victims might be coerced into taking out loans or making transactions under duress, creating what is termed "coercive debt" or "debt duress". Both scenarios leave survivors with insurmountable debt, severely impacting their financial stability and future prospects (Freedom United 2023; U.S. Office for Victims of Crime (OVC) (n.d.)). As a result, survivors of human trafficking may escape the direct harms of forced labor and/or sexual exploitation, but due to forced fraud, they are often perpetually victimized by financial exploitations linked to their identities.

2. Definitions and Concepts

To fully grasp the complexities of how human trafficking intersects with financial crimes, it is essential to define key terms and concepts.

2.1. Identity Theft

Identity theft is a widespread issue with severe implications for survivors, let alone when those survivors' positions have been comprehensively impacted through the exploitation of human trafficking and/or modern slavery. According to FinCEN, identity theft significantly impacts survivors' lives, both financially and emotionally (Financial Crimes Enforcement Network (FinCEN) (2020)). Traffickers capitalize on this by using victims' information to undertake further crimes, deepening their control over the victims. Survivors of identity theft often face long-term financial and legal consequences, making it difficult for them to rebuild their lives even after escaping their exploiters. In the context of human trafficking, identity theft can take many forms. When traffickers exploit survivors' names and identitied for financial crime, those fraudulent activities can leave victims with substantial debt and damaged credit scores, hindering their ability to secure housing, employment, and other essential services (Consumer Financial Protection Bureau (CFPB)

(2022)). The emotional toll of identity theft can also be profound, as victims grapple with the violation of their personal information and the financial instability it causes (Hossain et al. 2010; Greenbaum and Crawford-Jakubiak 2010).

There are a range of methods or pathways through which the "fraud and related activity in connection with identification documents, authentication features, and information", or more colloquially, "identity theft", occurs.[3] At the core of those activities is a victim's personal data being used for financial gain. Summarizing U.S. law, the crimes associated with identity theft involve knowingly presenting, holding, transferring, or in essence utilizing an "identification document, authentication feature, or a false identification document", knowing that the documentation containing identifiers was either stolen or produced without lawful authority. Within the range of identity theft, there are often aggravating circumstances, such as knowing the true identity of the victim to be a real individual (i.e., stolen credentials) and the risks compounded by synthetic identity theft. Synthetic identity theft is particularly challenging to detect because it involves the combination of real and fabricated data, making traditional verification processes less effective. This form of fraud not only impacts the victims but also poses significant challenges for financial institutions and law enforcement agencies. Traffickers exploit the gaps in identity verification systems to carry out their schemes, leaving survivors to deal with the fallout. The latter is generally the commission of identity fraud by leveraging a composite of either true identifiers from multiple victims or a combination of aggregated true and false identifiers to fabricate new, seemingly complete identifiers (Gordon 2023).

2.2. Money Mule Activity

Money mule activity represents a critical component of global financial crime networks, where individuals, often unknowingly, are manipulated into transferring illicitly obtained funds (Europol 2023). This form of exploitation intersects significantly with human trafficking, wherein traffickers coerce or deceive victims into becoming instrumental parts of their laundering operations. This exploitation is multifaceted, involving a complex interplay of deception, coercion, and the inherent vulnerabilities of trafficking victims. Further, victims of human trafficking may even be forced to launder the proceeds of their own victimization using banking products and services in their names through a range of schemes discussed below.

Human trafficking victims are particularly vulnerable to becoming money mules due to the extreme levels of control exerted over them by traffickers. Europol highlights that traffickers exploit the desperation, fear, and isolation of their victims to force them into money laundering activities. These victims, often trafficked for labor or sexual exploitation, are coerced into opening bank accounts, conducting wire transfers, and using their personal details to facilitate the movement of illegal funds. The manipulation techniques employed by traffickers can include threats of violence, actual physical harm, psychological manipulation, and promises of freedom or better treatment.

The intersection of human trafficking and money mule activity is not just a matter of financial crime but also a serious human rights issue. Traffickers use their victims to create a buffer between themselves and law enforcement agencies, making it difficult to trace the ultimate beneficiaries of the criminal proceeds. This practice not only perpetuates the cycle of exploitation but also complicates efforts to combat both human trafficking and money laundering. Victims caught in these schemes face significant legal and personal consequences, including criminal charges, damaged credit histories, and severe emotional trauma.

There is a compounded risk faced by trafficking victims, who may be forced into forms of modern slavery across a range of exploitations (e.g., labor, sexual, psychological, financial, etc.). As an operative component of that abuse, victims of human trafficking may be forced to work as operatives in money mule activities, not just moving funds themselves but manning various schemes to recruit other knowing and unwitting launderers.

According to the Federal Bureau of Investigation, non-trafficking money mules are recruited through various means, including online job advertisements, social media scams, and personal relationships/romance scams (Federal Bureau of Investigation (FBI) (2023)). Historically called task schemes and Recruiting Unsuspecting Money Launderers by Letters of Employment (RUMBLE), recruited victims are often promised easy money for minimal effort or work, without being informed of the illegal nature of the activities they are being drawn into (Federal Trade Commission (FTC) (2024a)). In many cases, these individuals may not be fully aware of the implications of their actions, believing they are participating in legitimate financial transactions.[4] However, some money mules are acutely aware of the illegality of their actions but are driven by financial desperation or coercion. This is particularly true in the case of romance scams, discussed in Forced Fraud Schemes.

The Commodity Futures Trading Commission (CFTC) has reported numerous instances where digital platforms are used to facilitate money mule activities, further entrenching potential survivors in complex financial crimes. Digital currencies and online financial services provide traffickers with a veneer of legitimacy and an additional layer of anonymity, making it harder for law enforcement to track illicit transactions. Victims are often forced to use these platforms to transfer funds quickly across borders, complicating jurisdictional efforts to combat these crimes (Commodity Futures Trading Commission (CFTC) (2024)).

3. Methodology

Human trafficking has been extensively studied through legal, policy, and academic lenses. Scholarship has explored its various forms, including sex trafficking, labor trafficking, and, increasingly, trafficking for the purpose of criminal exploitation, using a range of disciplinary approaches (Aronowitz 2017; Gallagher and Ezeilo 2015). However, despite this growing body of work, the true scale and scope of trafficking remain contested due to inconsistent global reporting mechanisms, definitional ambiguities, and the clandestine nature of trafficking networks (United Nations Office on Drugs and Crime (UNODC) (2015)). These structural issues significantly hinder the ability to disaggregate data by exploitation type, thereby obscuring more nuanced or emerging trafficking modalities.

A further challenge lies in the prevalence of polyvictimization, wherein the same individuals may be subject to multiple, overlapping forms of exploitation (Cockbain and Bowers 2019). This complexity complicates attempts to classify or isolate certain typologies, such as forced fraud, wherein individuals are explicitly trafficked to commit financial or identity-related crimes under duress. Although forced criminality is increasingly acknowledged as a legitimate form of trafficking, most scholarship and legal discourse tend to conflate various coerced criminal acts, failing to distinguish among subtypes like drug trafficking, theft, or fraud. As a result, forced fraud remains underrecognized in academic literature and anti-trafficking policy frameworks (Van der Watt and Kruger 2017).

In light of this gap, the present study adopts an exploratory qualitative design to examine the emergent phenomenon of forced fraud trafficking-linked form of financial exploitation in which victims are coerced into committing fraudulent acts, such as identity theft, synthetic identity creation, bank fraud, or online scams. Given the lack of centralized or disaggregated data on this typology, the research relies primarily on documentary analysis and the triangulation of diverse secondary sources from governmental, journalistic, and nonprofit domains. Wherever possible, primary data and statistics were drawn from reputable intergovernmental sources such as the United Nations Office on Drugs and Crime (UNODC). In instances where peer-reviewed materials were limited or unavailable, this review employs conceptual synthesis techniques, drawing on definitions, frameworks, and terminology developed by advocacy organizations and governmental bodies. This approach aligns with qualitative research practices that emphasize the contextual value of grey literature in constructing meaning, particularly in under-documented or evolving subject areas. Further, this approach aligns with Bowen's model of qualitative document analysis, which emphasizes the value of non-reactive, context-rich documents in developing conceptual understanding and theory generation (Bowen 2009).

The research sample includes investigative reports and strategic assessments from law enforcement agencies (e.g., Federal Bureau of Investigations (FBI), INTERPOL, Europol), international human rights and anti-trafficking bodies (e.g., UN Office of the High Commissioner for Human Rights (UNOHCHR), UNODC, and financial regulatory agencies (e.g., Financial Crimes Enforcement Network (FinCEN), Consumer Financial Protection Bureau (CFPB)). In addition, this research includes survivor testimonies and investigative journalism, such as reports by ProPublica, the Center for Strategic and International Studies (CSIS), and Thomson Reuters Foundation, provide critical insights into victim experiences and the coercive mechanisms and operational structures of forced fraud networks. Where applicable, citations to these entities' official publications were used to develop operational definitions and identify typological indicators specific to forced fraud.

This analysis was guided by Charmaz's constructivist grounded theory approach, which emphasizes meaning-making, pattern recognition, and emergent theory within a complex and evolving social landscape (Charmaz 2006). Rather than imposing predefined variables or seeking statistical generalizability, this methodology prioritizes contextual interpretation and synthesizing recurring themes across varied but thematically aligned documents. The constructivist lens is especially suited to this inquiry, as it allows for theoretical flexibility and responsiveness to emerging discourses, particularly in areas where empirical consensus has yet to form (Charmaz 2014).

Source inclusion for this study follows four primary criteria:

Credibility of source—materials had to be published by reputable organizations, governmental agencies, or respected journalistic outlets.

Topical relevance—sources needed to address the intersection of trafficking and financial or criminal exploitation, especially fraud-based offenses.

Insight into coercion and victim impact—the source must offer substantive information about the mechanisms of control and the lived experience of victims.

Recency—preference was given to publications from the past ten years (2014–2024), except in cases where older documents offered critical legal or definitional context.

By synthesizing these diverse materials, the research aims to fill a critical gap in the trafficking literature by constructing a theoretical framework for forced fraud. This aligns with Swedberg's call for "theorizing" in underdeveloped research areas (Swedberg 2014). This approach seeks to conceptualize phenomena systematically, integrating fragmentary data rather than waiting for a fully formed empirical corpus. In this sense, the study is both descriptive and generative, attempting to map the contours of a problem that is increasingly relevant yet persistently overlooked (Andreotti et al. 2016).

Due to the ethical and logistical challenges of engaging directly with victims of trafficking, particularly those involved in ongoing criminal proceedings or under legal supervision, this study did not involve research with human subjects. All materials were derived from public records, open-source documentation, and published testimony. Where available, survivor narratives are incorporated to illustrate themes; however, these accounts are treated as illustrative rather than generalizable, in recognition of the anecdotal nature of such sources and the risk of over-representation or trauma exploitation (Zimmerman and Watts 2003; Center for Substance Abuse Treatment 2014).

4. Forced Fraud Schemes

Traffickers may coerce their victims into participating in these scams, exploiting their vulnerabilities and lack of autonomy to extract money from unsuspecting individuals. Interpol highlighted this concern in a 2023 advisory, noting that "the trafficked workers are used to perpetrate a range of online fraud on a second set of victims, increasingly scattered around the world. The schemes include investment fraud, romance scams and frauds linked to cryptocurrency investing and online gambling" (INTERPOL 2023). To recall the basic tenets of human trafficking, while common imagery may call to mind visualizations of a victim forced into prostitution or sweatshop-type conditions, there is no legal requirement for the exploitation to involve those forms of abuse. Indeed, human trafficking can involve the forced conduct of even "white collar" types of fraud. These fraud schemes run the gamut from basic technological repair scams to far more sophisticated "pig butchering" scams being perpetrated by the victims of human trafficking under threat, coercion, and duress (Dove 2024).

So-called "pig butchering" scams involve fraudsters cultivating long-term relationships with their victims, often through social media or dating sites, before manipulating them into making substantial financial investments in fraudulent schemes (Financial Crimes Enforcement Network (FinCEN) (2023a)). While those pretextual relationships are being built, there may be deceptive money movement by the purported romancer/paramour (Fu 2024). This leads to the final "pig butchering"/investment fraud scheme of an unsuspecting victim (Palmer 2022; Financial Crimes Enforcement Network (FinCEN) (2023a); INTERPOL 2023). Meanwhile these crimes are being unwillingly committed by victims of crime themselves (National Child Traumatic Stress Network (NCTSN) (2014)).

First-hand accounts from individuals trafficked, deceived, or threatened into committing scam crimes provide harrowing insights into the dark underbelly of financial fraud operations. Leveraging publicly credible sources, there are numerous examples of individuals who were deceived and ultimately threatened into committing various call center-type scams by human trafficking exploiters. In addition to these personal accounts, investigative reports, and studies provide further evidence of the exploitation and coercion involved in scam call centers. The Federal Bureau of Investigation (FBI) has documented numerous cases where individuals, particularly from vulnerable communities, were trafficked and forced into these operations. According to the FBI, these victims often face threats of violence, deportation, or harm to their families, which compels them to comply with the demands of their traffickers (Federal Bureau of Investigation (FBI) (2024)).

A recently published study on forced fraud/criminality focusing on online/phone scam centers highlighted the complex nature of these incidents through first-hand accounts of scam operatives (UNOHCHR 2023). The report noted that a mosaic of socioeconomic concerns were exacerbated by the COVID-19 pandemic, resulting in an increased sense of fiscal desperation. When promised opportunities to generate income well above the average wage within their region, victims of this form of exploitation were deceived into working in technology repair, romance, and pig butchering/investment type schemes. Per the report, "[m]any of those who have been able to leave a scam operation report that they were fraudulently recruited, deceived into believing that they were moving to legitimate jobs.

They may have learned of these jobs via social networks, or from a job site that is believed to be legitimate." Many reported that they saw the advertisement on a social media platform, including many of the best known such as Facebook, Instagram, and Tinder. The conditions offered in these fraudulent ads are typically very attractive, for example promising a high salary, regular bonuses, free accommodation, and food (UNOHCHR 2023, p. 14). Summarizing some of the accounts, survivors recognized a chilling duality very early into their circumstances, i.e.,: (1) that they had been lured to a foreign (even if intra-country) locale under false pretenses; the legitimate job and steady income they were promised was contingent on committing fraud; and (2) if they did not comply with their exploiters, they or their families would face unimaginable consequences. When the would-be employees arrived, their identification documents were often confiscated and outward communications entirely restricted, referred to by UN human rights experts as "detention incommunicado" (United Nations News 2022).

These patterns mirror the typical exploitation pattern of human trafficking, referred to below, such as debt bondage and false pretense leading to exploitation. The deceptions employed by exploiters are further nuanced, even where there is a degree of knowledge about the nature of a scam call center's operations (Kiss and Zimmerman 2019). As the UN report continues, even where survivors knew that they were going to be committing a fraudulent activity of some type, the context in which they would be "working" and living was severely misrepresented. Collating first-hand accounts from the UN report and other credible sources, there are instances where, once recruited and relocated, victims are not allowed to leave the operations' compound except under escort and/or are paid well below the enticing wages that were promised or entirely unpaid, if not subject to physical and psychological torture in order to propagate the underlying fraud scheme.

As with many unfortunate cases of human trafficking, there are often multiple overlapping abuses occurring at once. For example, a victim who is forced to work in a particular area (e.g., agriculture, food services, custodial services, etc.) may also be forced into sexual exploitation and prostitution by their captors. This is due the exploiter's view of "maximizing" the earning potential from their victims through domestic servitude, forced labor, and forced commercial sex (U.S. Department of State Office to Monitor and Combat Trafficking in Persons 2023c; National Human Trafficking Hotline n.d.; Wheaton et al. 2010). Simultaneously, the threat of physical and sexual violence is often used as a means of further control by the exploiters running these scam center operations (Muntarbhorn 2022). Examples of first-hand reports and investigations of these types of abuses can be found easily, including the following:

In a detailed account, a survivor named Fan described being lured by the promise of a legitimate job, only to be sold to a scam operation. Fan witnessed severe abuse, including a worker being "half-beaten to death" by guards. After a failed escape attempt, he was resold to another criminal organization. Fan's job involved posing as an attractive woman online to lure victims into fraudulent schemes. The operation was highly organized, with detailed training materials on manipulating targets psychologically. Throughout this time, Fan's initial debt bondage increased, including when he was deceived into an "escape" only to later learn that his would-be rescuers were yet another fraudulent operation (Podkul and Liu 2022).

The Center for Strategic and International Studies (CSIS) discussed how the pandemic exacerbated human trafficking and cyber scam operations. Victims, often recruited through fake job ads, were deceived into believing they were obtaining well-paying jobs in customer service or information technology. Upon arrival, their passports were confiscated and they were subjected to physical and sexual abuse, starvation, and debt bondage. These conditions were reported in numerous compounds, particularly in Sihanoukville, Cambodia, where thousands of victims are held (Burke et al. 2023).

In its review of Interpol's Operation Storm Makers II, The Register noted that Interpol's investigation rescued over 140 individuals from over 22 countries. The Register's article noted that there are 360 similar such investigations ongoing as of the time of the article. The Register's article included a first-time instance of a case of human trafficking explicitly for the purposes of cyber fraud, finding that "an accountant was lured to southeast Asia to work for a cyber fraud operation before eventually being returned in exchange for a ransom payment". The Register's article went on to reiterate thematic abuses (e.g., physical, financial, sexual, psychological, etc.), adding the additional haunting element of forced organ harvesting (Jones 2023).

In a similar investigation, Europol carried out simultaneous raids in France, Italy, and Romania, supported by investigators from Austria, Germany, Romania, Spain, and Switzerland. While this scheme was similar in theme to many other large scale money mule operations, this particular group targeted high-net-worth investors and outsourced the money laundering components to an external network of money launderers. These so-called "rip-deal" scams involve money washing, deceiving participants into allowing their accounts to be used for the exchange and/or withdrawal of currency given to another syndicate representative (Europol 2024). This investigation highlighted the risks of the "crime-as-a-service business model" that often involves the above-referenced forced fraud schemes, as well as the red flags outlined in the FATF report on Professional Money Laundering (Financial Action Task Force (FATF) (2018)).

5. A Victimological Approach to Restorative: Financial Justice

A common misconception about how duress "functions" is that there is a perception of human trafficking victims being under constant oversight by their victimizers. There is undoubtedly a shadow of fear under which modern slavery victims live, and many times, that fear is reinforced through an endless cycle of abuse, forced sexual exploitation and/or labor, and periods of relative inactivity. Many of the red flags ascribed to human trafficking, in particular those with a nexus to fraud and money laundering, operate on the premise that a "minder" or "chaperone" will be at the banking facility with the victim, if not speaking on their behalf (Financial Crimes Enforcement Network (FinCEN) (2014); Financial Crimes Enforcement Network (FinCEN) (2023b)).

Those red flags are proven and should not be dismissed where observed. At the same time, trafficking victims may be given the limited autonomy to be able to operate on their own, under threat of further abuse (i.e., to them, their families, etc.) or deportation if they are not successful in their forced endeavors and even more so if they do not return to their exploiters. Various studies and surveys have found that trafficking victims are often reluctant to reach out to social services, in particular if they came into a particular country outside of the legal immigration channels (Petrie-Flom Center for Health Law Policy, Biotechnology, and Bioethics at Harvard Law 2018). It is of course critical to recall that human trafficking by its very definition does not require that a victim is from or moved to a foreign country, and while it is common, language barriers are not always a root cause of these misconceptions.

However, victims of human trafficking often do not seek help due to various factors such as language barriers, fear of their traffickers, and mistrust of law enforcement (World Population Review 2024; Hussemann et al. 2018). This makes it even more difficult to find reliable and credible statistics on the number of trafficking victims who are incarcerated based on the crimes they committed under various forms of duress. Simultaneously, many victims of trafficking become victimized by the networks of individuals who "helped" them move across borders; they are forced into labor and/or sexual servitude to pay the tolls and fees associated with trafficking (Homeland Security Investigations, Immigration and Customs Enforcement (ICE) (2017)). As noted, human trafficking can, and does, occur on a local scale, and that same sense of instilled terror can be imbued in a modern slavery victim taken blocks from their home as one taken miles from their home country.

This dimension of "constructive" control is at the heart of the underlying concerns of this article and a core misunderstanding within both financial services and law enforcement.

Specifically, that witness statements and records may have reflected that the trafficking victim operated as if the frauds committed were first-party crimes, when in reality, they had no choice but to commit those crimes (Alvarez and Cañas-Moreira 2015). Further, there are the more complex considerations that additional crimes may have been committed in their name/with their identifiers without their knowledge, in parallel to the perceived first-party frauds. Viewed through the wrong lens, these behaviors could create a tableau of both the requisite intent for charging purposes and an appearance of the sophistication needed to execute those crimes. Further, if the sequence of crimes committed by and in the name of a trafficking victim are presented chronologically without the context of the threats, coercion, and duress relative to their victimization, a legal panel (e.g., judge, jury, immigration hearing, etc.) might view them as an opportunistic criminal or one using the guise of human trafficking to serve as a legal defense for the fraud committed (The Centre for Social Justice 2021). Combine this risk with a language barrier and lack of social services, as is often the case, and there is a material concern that trafficking victims could be railroaded by the legal frameworks that should be empaneled to help them.

6. A Potential Framework for Restorative Financial Justice for Human Trafficking Victims

Globally, legal structures allow for rebuttable presumptions of victimization under the oppression of human trafficking, but those laws do not mandate a survivor-centric approach, and even more so, do not encompass fraud and financial crimes committed under duress by survivors of modern slavery (The Law Library of Congress 2022; National Institute of Justice (NIJ) (2021); Hussemann et al. 2018). While germane to human trafficking, the relief from criminal charges is often codified for common commercial sex trade-related charges such as solicitation and/or pandering. Numerous government entities, NGOs, and other similar advocacy groups have identified the need to implement a survivor-based approach to human trafficking, identity theft, and other illicit activity in isolation, reflecting inroads toward restorative justice for survivors of human trafficking (Office for Victims of Crime 2010; National Institute of Justice (NIJ) (2021); Mullin 2020; U.S. Department of State Office to Monitor and Combat Trafficking in Persons 2023a).

Addressing the financial ramifications of human trafficking is essential for the comprehensive restoration and empowerment of survivors. Section VI of the UNOHCHR's report underscores the critical importance of restorative justice and comprehensive services for survivors of human trafficking involved in online scam operations. A central tenet of this approach is the non-punishment principle, which ensures that trafficked individuals are not criminalized for offenses they were compelled to commit as a direct consequence of their trafficking situation. This principle aims to protect survivors from being treated as criminals, which can exacerbate their trauma and hinder their recovery and reintegration into society (UNOHCHR 2023).

The UNOHCHR emphasizes the necessity of expunging criminal records for trafficked persons. These records, often a result of crimes committed under duress, can pose significant barriers to accessing essential services, securing employment, and achieving long-term reintegration. By eliminating these records, the result would potentially create an effective approach to supporting trafficking survivors, allowing them to rebuild their lives without the stigma of a criminal past. The report also highlights the need for creating firewalls between immigration enforcement, criminal justice, and service providers. These firewalls are crucial for ensuring that all trafficked persons can access justice and assistance without fear of arrest, detention, or deportation due to their migration status, noted in h's assessment (Petrie-Flom Center for Health Law Policy, Biotechnology, and Bioethics at Harvard Law 2018). The existence of such firewalls would prevent the sharing of information between agencies that could lead to the detention or deportation of trafficking survivors (Criminalisation of Migration and the Importance of 'Firewalls' 2017). This separation is essential for building trust between survivors and service providers, encouraging survivors to seek help without the fear of legal repercussions.

To implement these firewalls effectively, the report recommends clear and enforceable policies that delineate the boundaries between different agencies and their respective roles in addressing trafficking. These policies should ensure that immigration status does not become a barrier to accessing justice and support services. Additionally, the report advocates for the provision of secure reporting mechanisms that allow survivors to come forward and seek help without the risk of being penalized for their immigration status.

6.1. A Hybridized Approach

While the above studies are a positive step toward progress, their concepts must be collated and developed into an integrated framework for restorative justice. Notably, the U.S. CFPB issued an advisory on the reporting of elder financial exploitation (EFE) by financial institutions. The CFPB's advisory included somewhat novel concepts and, more importantly, a definitively victimological approach.[5] Integrating the CFPB's advisory and the UNOHCHR's report, legal structures and support must go further in understanding the nuanced indicators of human trafficking-coerced fraud in implementing the non-punishment and firewall concepts. For example, where laws and claimant structures implement a hybridized rebuttable presumption of operating under duress and/or impaired cognition, the same approach should be taken toward human trafficking duress. Similarly, the U.S. Department of State advocates for both a trauma-informed approach to restorative justice and/or services, as well as ethical storytelling on the path to providing and encouraging advocacy and access to sustainable services (U.S. Department of State Office to Monitor and Combat Trafficking in Persons 2023a).

Combining the UNOHCHR's and CFPB's themes for the effective implementation of the non-punishment principle and the firewall concept, both call for improved training and awareness amongst criminal justice personnel and other relevant stakeholders. This outreach should focus on understanding the complexities of trafficking situations and applying the non-punishment principle appropriately in circumstances of forced fraud. It is essential that law enforcement officers, prosecutors, and judges recognize the signs of trafficking and the coercive circumstances under which victims may have committed financial crime offenses. By fostering a deeper understanding of these issues, the criminal justice system can better protect the rights of trafficked individuals and support their path to recovery. Long-term assistance for returnees is also emphasized as a critical component of restorative justice. Tailored support for sustainable reintegration includes housing, healthcare, education, and assistance in securing a decent job. These measures are vital for preventing re-trafficking and ensuring that survivors can rebuild their lives in a supportive environment (United Nations Office on Drugs and Crime (UNODC) (n.d.)).

These themes were reviewed as part of a targeted study on the reintegration of human trafficking survivors by UNICEF. As with other studies involving survivors of modern slavery, the population of victims both willing and able to speak to support groups was limited. However, the UNICEF study found that economic restoration was a critical component of survivor reintegration. In fact, the study concluded that economic/financial restoration, social services, legal aid, counseling, and the above-referenced firewall and non-punishment principles (through reference to the UN protocol) should be both interconnected and survivor-centric in their approach.[6] While not directly stated in the UNICEF survey, the implications of a victimological approach to forced fraud participants were reiterated with paramount importance. The UNICEF report noted that, at the time of the survivor interviews, the respondents had all had access to social services as well as psychological counseling prior to engaging in the interviews. This evoked a critical honesty in the survivors' responses, highlighting the need for open, unbiased, and informed assistance. While perhaps not the focus of the UNICEF report, one of the more impactful observations in the study was on the accessibility of restorative financial services in their home country. Albania offers a range of financial support as well as other social services for survivors of human trafficking; however, the survivors interviewed in the study confirmed a range of psychosocial and bureaucratic barriers to accessing those benefits.

For example, the survivors reflected on a sense of shame and/or confusion in enrolling in educational benefits, and more importantly, the administrative challenges of the benefits themselves:

"Finally, trafficking survivors who are unemployed and have a declaration from an appropriate frontline professional that they are a survivor of human trafficking are entitled to receive ALL 9000 per month in economic assistance. However, the study identified that few survivors are accessing this economic assistance. The main reasons are that applying for economic assistance is time-consuming, the amount of such assistance is low, and the survivors may face discrimination from frontline professionals when applying for assistance" (Davy 2022).

In its simplest terms, the above selection from the UNICEF study reinforces the need for appropriate and compassionate financial restoration of survivors of human trafficking. Plainly stated, the survivors' government offers education, vocational training, and support, but those resources remain challenging to access.

By contrast to the UNICEF study, many survivors of forced fraud are in foreign jurisdictions, may not have the same state-driven benefits there or in their home country if they are even able to return, and may suffer from the same bureaucratic limitations faced by the UNICEF study's respondents without the benefit of an ethical storytelling narrative and social services. Importantly, not all victims and survivors of human trafficking are from a foreign jurisdiction, but even survivors trafficked intra-state or intra-country will likely face the same challenges. As a result, their ability to reach a level of stability in their own lives, let alone achieve a level of understanding with regional law enforcement about crimes committed under the duress of human trafficking, may be severely impacted. Those survivors may suffer the repetitive cycle of trafficking and/or recidivism faced by other survivors of human trafficking, made worse by the brief sense of hope that they may have had when they were detained by law enforcement for their forced fraud and believed that they could simply tell their story to access rescue and restore their identities.

6.2. Recommended Tools and Resources

Education and training have been hallmarks of regulatory advisories for over a decade, including through the earliest bulletins (Financial Crimes Enforcement Network (FinCEN) (2014)). That same frontline training is included in the CFPB's advisory. While training is paramount for those on the frontline of identifying financial exploitation among human trafficking survivors, the post-identification and escalation handoff to the legal and social services ecosystem is even more so.

Between the bureaucracy of the criminal justice and social services systems and inherent biases that can arise with both international and domestic trafficking survivors, those in need of basic let alone restorative financial justice may not be able to access it (Federal Government Efforts to Combat Human Trafficking, Office on Trafficking in Persons, Office of the Administration for Children & Families 2020). Establishing a framework for a victimological approach to restorative financial justice is reliant on the same "unconditional" access to social services and resources (PICUM 2022). This unconditional access calls for a proactive approach to understanding the nuanced methods of victimization that individuals may face throughout the immigration process, in order to determine the best-suited restorative needs of those individuals. In its study, the Platform for International Cooperation on Undocumented Migrants further explored how victimization of crimes (e.g., physical violence, extortion, gender-based violence, etc.) cooccurs with undocumented relocation. Taking this one step further, these same conditions are noted in intra-state, interstate, and international human trafficking, let alone forced fraud. Applying that same understanding to survivors of forced fraud, it is equally as critical to ensure that they are provided unfettered and informed access to education, financial literacy, and restorative services. This should include the expungement or even non-prosecution for frauds (i.e., nonviolent financial crimes) committed under the coercion and duress of human trafficking and/or modern slavery (Criminal Record Relief for Trafficking Survivors 2023).

This non-prosecution approach is a common theme of academic and regulatory studies but must be expanded to include forced fraud (U.S. Department of State Office to Monitor and Combat Trafficking in Persons 2023b). Those crimes certainly impact the victims of frauds but also take a psychological toll on the forced perpetrators of those crimes (U.S. Department of State 2014; International Justice Mission n.d.; Waltz et al. 2023). Prosecutors often take a transactional approach to criminal justice, offering plea bargains and even immunity in exchange for support in targeting the higher-level operatives in criminal schemes. Per the American Bar Association's Plea Bargain Task force, as many as 98% of cases end in a plea bargain, which includes circumstances where defendants plead guilty to crimes they did not commit (Johnson 2023; Beshai 2023). One factor influencing plea bargaining is pretrial detention, which is incredibly common with undocumented survivors of human trafficking who are later arrested in a foreign jurisdiction.[7]

The below recommendations are aggregated from various sources, including the UNODC, U.S. Department of State, charitable organizations, and NGOs. While these recommendations are thematically in line with other survivor-centric approaches to human trafficking, they should be read, as intended, with a focus on financial restorative justice.

6.3. Financial Redress and Credit Repair/Protection

Establishing mechanisms for financial redress is crucial. Compensation funds and restitution orders should be developed to restore survivors' financial stability. Survivors of trafficking often find themselves in positions where they do not have an employment history, let alone untarnished banking history. These impediments can make accessing and maintaining financial services incredibly difficult post-emancipation. There are many legal and nonprofit entities that create asset forfeiture provisions and similarly call for those funds to be used to compensate survivors (The National Human Trafficking Victim Assistance Program 2024). This can include direct financial compensation, as well as covering costs related to identity restoration, legal fees, and other expenses incurred due to financial exploitation. Survivors of human trafficking often find their credit scores severely damaged due to fraudulent activities carried out in their names. Implementing programs to help survivors repair their credit is essential. This can include expunging fraudulent activities from credit reports, offering credit monitoring services, and providing access to low-interest loans or grants to help rebuild their financial health.

In June 2022, the CFPB actioned such an effort by issuing a final rule amending the Fair Credit Reporting Act (FCRA). Regulation V added additional provisions to the FCRA, in essence creating pathways for identifying and removing adverse credit reporting information caused by the circumstances of human trafficking.[8]

Among other amendments, Regulation V requires a proof of identity, victim determination documentation, and a list of the specific items to be removed from a credit report

(Polaris 2022). While this is a very positive step in addressing the financial harms caused by forced fraud, the regulation is contingent on a degree of knowledge and understanding about how a survivor's information may have been misused. Often times, identity theft and related crimes have a lagging indicator effect, resulting in crimes not being detected for protracted periods of time (Federal Trade Commission (FTC) (2024b)). Further, because exploitations were conducted on those survivors, potentially even by a range of exploiters, it can be difficult for survivors to pinpoint the "exact" disputed credit reporting items. As Polaris notes, obtaining the victim determination documentation in and of itself can be difficult and assumes that the law enforcement entities providing that documentation do not view the survivor as a perpetrator. This also assumes that standardized victimization documents exist, are available, and that the recipient agencies are aware of their purpose and use. Further, Regulation V assumes that the survivor has access to both a utility bill and their own identifying documents. Often times, exploiters will take and even destroy victims' identity documents, making this dimension of restorative justice incredibly difficult (Polaris 2021).

This is why assurance is necessitated by the circumstances of human trafficking, and modern slavery requires comprehensive case management and legal assistance.[9] Providing holistic case management services that address both financial and non-financial needs is essential for the recovery of human trafficking survivors. Case managers can liaise if not advocate for survivors in navigating the complexities of financial recovery, accessing compensation, and obtaining legal services. This comprehensive approach ensures that all aspects of a survivor's recovery are addressed in a coordinated manner, including access to the subsidized services referenced above (Legal Aid NYC n.d.).

Access to legal services is crucial for survivors to address identity theft, fraud, and other financial crimes. Legal aid organizations should be funded and trained to assist trafficking survivors in reclaiming and restoring their financial identities, as well as ensuring that those changes are positive, consistent, and sustainable. This includes representing survivors in court, helping them to expunge fraudulent charges, and ensuring that they are not held liable for debts incurred through forced fraud and/or duress. Another core component of aid and support services is ensuring there is appropriate financial education that is both restorative and survivor-centric. Victimization can often impede intellectual growth and, in some cases, cause the regression of intellectual development (Deck et al. 2017). With the combination of those potential impacts and the array of hostile and manipulative circumstances faced by victims, ensuring that training is comprehensive and empathetic is critical. Financial education should center on both functional knowledge and empowerment in order to equip survivors with the knowledge and skills needed to manage their finances independently. These programs should cover basic financial literacy, budgeting, understanding credit, and recognizing and avoiding financial exploitation. Empowering survivors with financial knowledge can help them regain control over their lives and prevent future exploitation. Further, survivors need trained advocates to help them access, at a minimum, the benefits of Regulation V and more.

In tandem with those efforts, portions of restorative funds need to be set aside at the governmental level in order to create stable, subsidized, and interconnected opportunities for survivors to access banking services with priority. Again, there are mechanisms for compensatory justice where funds are provided to survivors and/or for their benefit, but by dedicating funds for access to banking services that are stable and offer a modicum of guarantee of the same "unconditional" access recommended in so many survivor-focused reports, the odds of restorative financial justice for survivors improves (Group of Experts on Action against Trafficking in Human Beings (GRETA) (n.d.)). Whether this ongoing support takes the shape of government funding and/or subsidies from survivorship funds or tax credits to incentivize financial institutions to create those programs, the critical dimension of these types of programs is strong oversight to ensure that the complex and often biased hurdles that survivors face are eliminated (The Legal Rights and Needs of Victims of Human Trafficking in the United States 2015).

Other routes could include safe banking products for traditional financial institutions (e.g., consumer/retail checking and savings), as well as money services businesses. These could include fee-free accounts, enhanced fraud protection, and financial counseling services. Safe banking products can provide survivors with a secure way to manage their finances and access necessary financial services without fear of exploitation. This should also include the negation of fraud-related referrals to warning systems, such as Chex and Early Warning Services, which may prevent survivors from regaining legitimate access to banking products and services (Consumer Financial Protection Bureau (CFPB) (2022)).

Finally, additional policy and research work is desperately needed in the human trafficking and modern slavery space, with even more inquiry into forced criminality and fraud. Forced criminality has become more of a matured concept, even if supporting policy and legislation have not kept pace (U.S. Department of State 2014). As with other areas of victimological studies, centralized databases are needed in order to collect, vet, and analyze the concept of forced fraud. These must include both quantitative and qualitative studies across the lifecycle of forced fraud in order to identify remediation and restorative treatment options (Preble et al. 2022). This is particularly important since, as noted, survivors often find themselves subject to prosecutorial and professional biases (Love et al. 2018). Strong, survivor-centric data on forced can inform policy development and resource allocation, ensuring that efforts to support survivors are based on accurate and comprehensive information. As with other areas of human trafficking and modern slavery, data collection should be conducted in an ethical manner that respects the privacy and dignity of survivors.

6.4. Targeted Policy Recommendations

Building upon the structural considerations outlined in this section, the following policy recommendations distill the conceptual and institutional challenges of forced fraud into specific, actionable reforms. These proposals aim to operationalize a survivor-centered response to coerced financial crimes, providing clear steps for legislators, regulators, financial institutions, and service providers. Where applicable, references have been provided to support each recommendation and assist with its implementation.

1. **Tailored Expungement Protocols for Survivors of Forced Fraud**
   Policy Action—Implement Expungement Mechanisms for Coerced Criminal Acts including advocacy for federal and state legislation to provide automatic expungement or vacatur of convictions resulting from financial crimes committed under coercive trafficking conditions.
   Rationale—Survivors of trafficking are frequently prosecuted for crimes they were compelled to commit under duress. A criminal record tied to such coercion creates long-term barriers to housing, employment, education, and stability. Vacatur laws offer an essential pathway for recognizing victimization and restoring basic rights (International Women's Human Rights Clinic (IWHRC) (2014); Polaris Project 2023; Sex Workers Project 2012). Expanding these laws and standardizing their implementation ensures survivors are not punished for their exploitation. This must include circumstances where a survivor's name, identifiers, or other personally identifiable information was used to access financial instruments or products of any kind. This must also include instances of first-party fraud in the survivor's name, as well as

forced “authorized payment” fraud, where the survivor is forced to use their financial services to facilitate illicit activity at the instruction of their exploiters (Toh 2024).

2. **Victimological Regulatory Guidance**
   Policy Action—Advance a victimological approach within refreshed regulatory guidance, typology updates, and industry advisories. This highlights financial indicators of coercion and trafficking-linked forced fraud. Encourage the development of pathways that support survivor-centric detection, investigation, and reporting practices.
   Rationale—The financial behavior associated with human trafficking often mirrors patterns seen in the financial exploitation of the elderly, particularly in cases involving authorized party fraud. In both contexts, transactions may appear self-initiated, authorized, or even complicit while, in reality, the transactions are driven by exploitation and predation (Financial Crimes Enforcement Network (FinCEN) (2020)). A victim-centered framework would enable institutions to better document fraud and financial activity completed under duress or without the victim-survivor’s knowledge or consent. FinCEN’s 2021 SAR instructions affirm that victims are not to be reported as SAR subjects, reinforcing the importance of survivor-protective compliance approaches. Incorporating this lens into updated guidance and training can enable earlier identification of trafficking-linked abuse and reduce the risk of revictimizing those coerced into financial systems (Financial Crimes Enforcement Network (FinCEN) (2021)).
3. **Survivor-Focused Financial Recovery and Literacy**
   Policy Recommendation—Explore the development and funding of survivor-specific financial recovery programs, inclusive of credit repair and financial profile restoration, financial literacy, and relief from debt developed through exploitation and forced fraud.
   Rationale—Survivors of forced fraud face long-term harm to their credit, identity, and financial standing (Zimmerman and Kiss 2017; Baird 2019). Traffickers may use victims’ personal information to take out loans, open fraudulent accounts, or incur debt in their names, leaving survivors with damaged credit and limited access to employment or housing. Without tailored financial recovery mechanisms, survivors remain entangled in the aftermath of their exploitation, having been viewed as perpetrator/subjects as opposed to victims of fraud and illicit activity. Programs should be trauma-informed, easily accessible, and connected to wraparound services to enable full reintegration. Models like those recommended by Polaris, the U.S. Committee for Refugees and Immigrants, and the Thomson Reuters Institute demonstrate potentially scalable pathways for banking access, debt relief, and credit rebuilding (U.S. Committee for Refugees and Immigrants (USCRI) (2023); Polaris 2018; Thomson Reuters Institute 2023).
4. **Trauma-Informed Communication and Education**
   Policy Recommendation—Mandate trauma-informed training and protocols across all stakeholder systems that interact with trafficking survivors such as courts, law enforcement, financial institutions, and service providers.
   Rationale—Drawing on the circumstances of survivors of human trafficking in general, survivors of forced fraud are likely frequently misidentified as offenders and retraumatized by punitive legal and bureaucratic systems (U.S. Department of Health and Human Services 2007). Trauma-informed models create a pathway to justice, dignity, and long-term healing by recognizing victim status and adapting support accordingly (National Survivor Network 2016).
5. **Integrate Forced Criminality into Survivor Identification Protocols**
   Policy Action—Update survivor screening tools and law enforcement protocols to include red flags for forced fraud, scam participation, and digital fraud (U.S. Depart-

ment of State 2023).

Rationale—Victims engaged in scam centers or money mule schemes are often excluded from recognition as trafficking survivors. Incorporating these indicators into identification tools will improve detection of forced fraud and ensure more victims are routed to services rather than punished (INTERPOL 2023).

6. **Revise Definitions of Trafficking in National and International Law**
   Policy Action—Expand statutory and international definitions of trafficking (e.g., Palermo Protocol, federal law) to explicitly include financial crimes and forced criminality under coercion (Piper et al. 2015).
   Rationale—Current legal definitions prioritize sex and labor trafficking, which is justifiable considering the gravity of the effects of those circumstances on survivors. However, this can also often exclude survivors trafficked into scams, bank fraud, or cyber-enabled financial crimes. This exclusion results in survivors being denied protections and resources. Legal reforms should recognize coercive control and exploitative criminality as being integral to modern trafficking (Van der Watt and Kruger 2017).
7. **Expand Legal Standing for Trafficked Individuals to Challenge Debt and Contracts**
   Policy Action—Encourage the passage of legislation allowing survivors to void or challenge contracts, financial obligations, and loans incurred under threat, fraud, or coercion, including those executed digitally or under false pretenses (Center for Survivor Agency and Justice (CSAJ) (2022)).
   Rationale—Survivors should not remain liable for obligations tied to their exploitation. Legal tools for contesting coerced agreements will help restore agency and economic justice (Canadian Centre to End Human Trafficking 2023).

7. Conclusions

The phenomenon of forced fraud represents a profound and often overlooked dimension of human trafficking that extends the suffering of victims far beyond the physical chains of exploitation. Financial institutions, legal frameworks, and social services are all deeply intertwined with the mechanisms of coercion that traffickers employ to subjugate their victims. Survivors are not only forced into labor or sexual servitude but are also manipulated into lax oversight or inadequate safeguards. There must be structured efforts to offer survivors the tools and support necessary to rebuild their lives, access to banking services, credit repair, and educational resources that foster long-term financial independence.

To continue to ignore the forced fraud dimension of human trafficking is to allow a significant part of this crime's devastation to go unaddressed. We cannot claim to support survivors if we fail to recognize and remedy the economic exploitation that is integral to their victimization. The fight against human trafficking must evolve to include this broader understanding of exploitation, ensuring that survivors are given the means not just to survive but to thrive in the aftermath of unimaginable abuse. It is only through such comprehensive reforms that we can offer true justice to those who have survived the horrors of trafficking and exploitation.

Funding: This research received no external funding.

Institutional Review Board Statement: Not applicable.

Informed Consent Statement: Not applicable.

Data Availability Statement: The original contributions presented in this study are included in the article. Further inquiries can be directed to the corresponding author.

Conflicts of Interest: The author declares no conflict of interest.

Notes

[1] Note—where applicable, the designation of "victim" may be used to refer to a person currently in or under conditions of human trafficking and/or modern slavery. Where applicable, this term will be replaced with the more appropriate designation of "survivor", which reiterates the importance of understanding the victimological approach to human trafficking and/or modern slavery. Many instances of this pattern of abuse share commonalities, but no two circumstances, victims', or survivors' experiences are or should be treated as the same. "The words "victim" and "survivor" of human trafficking can be used interchangeably. It is preferable to use "victim" to refer to someone currently in a human trafficking situation. . . [or] used when referencing rights or resources that a victim is legally mandated to receive". "The term survivor is used to refer to someone who was once in a human trafficking situation but is no longer being trafficked. Popular media, TV, or movies often depict trafficking victims or survivors only as being helpless and weak. However, these same survivors show great strength and the ability to survive in extremely dangerous and traumatic situations" (Polaris 2023; Survive and Thrive Advocacy Center n.d.; National Human Trafficking Training and Technical Assistance Center n.d.).

[2] "'Modern slavery' is an umbrella term covering various forms of coercion into labour situations. This includes such crimes as human trafficking for forced labour, forced commercial sexual exploitation, and indentured labour. A typical typology of modern slavery involves a lack of consent, with victims unable to refuse or leave because of threats, violence, coercion, deception and/or abuse of power" (Mekong Club n.d.).

[3] See 18 U.S.C § 1028, et. seq.

[4] "In a task scam, scammers ask you to do simple, repetitive tasks, such as liking videos or rating product images online. The supposed "job" is to complete tasks in an app or online platform for which you'll "earn money" from a "commission" on each click. But those promises are fake: there aren't any commissions and nobody but the scammers make any money" (Kreidler 2024; Bungo et al. 2023).

[5] The CFPB's advisory refers to commonly leveraged utilities like automated suspicious monitoring, manual escalations, and training for potential EFE reporters, the framework of the calls for a tone of compassion and understanding. Specifically, the 2016 advisory makes reference to extending filing deadlines for elder customers to file claims, amending fraud claim decisioning to accommodate potentially diminished capacity, and claims that would otherwise be dismissed due to consumer negligence (e.g., writing a PIN on a debit card, etc.) (Consumer Financial Protection Bureau (CFPB) (2019)).

[6] "Economic reintegration should not be viewed separately from social integration. Service provision within economic and social integration frameworks needs to be interlinked and translated into streamlined service provision. Service provision should, furthermore, be survivor-oriented. Increased capacity building of all service provider professionals should be strengthened, with all relevant professionals made aware of the importance of survivor-centered service provision and the importance of the advisory cycle for planning service provision" (Davy 2022; UNOHCHR 2000).

[7] (United Nations 2006) Victims of human trafficking may be facing deportation before they have had a chance to establish that they are victims of trafficking. In many countries, apart from criminal proceedings against offenders, there are often no formal judicial or administrative proceedings in which a person's status as a "victim of trafficking" can be determined. A victim's deportation may compromise the future success of a criminal prosecution. Furthermore, article 25, paragraph 3 of the Organized Crime Convention and article 6, paragraph 2 (b) of the Trafficking in Persons Protocol both require that States parties ensure that victims are able to present their views and concerns at appropriate stages of proceedings against an offender. This may necessitate the deferral of deportation until that stage has been reached.

[8] "The Consumer Financial Protection Bureau (CFPB) is amending Regulation V, which implements the Fair Credit Reporting Act (FCRA), to address recent legislation that assists consumers who are victims of trafficking. This final rule establishes a method for a victim of trafficking to submit documentation to consumer reporting agencies, including information identifying any adverse item of information about the consumer that resulted from certain types of human trafficking, and prohibits the consumer reporting agencies from furnishing a consumer report containing the adverse item(s) of information. The Bureau is taking this action as mandated by the National Defense Authorization Act for Fiscal Year 2022 to assist consumers who are victims of trafficking in building or rebuilding financial stability and personal independence" (Consumer Financial Protection Bureau (CFPB) (2024)).

[9] Legal aid is understood to include "legal advice, assistance and representation for persons detained, arrested or imprisoned, suspected or accused of, or charged with a criminal offence and for victims and witnesses in the criminal justice process that is provided at no cost for those without sufficient means or when the interests of justice so require" and includes legal education, access to legal information and other services provided for persons through alternative dispute resolution mechanisms and restorative justice processes (United Nations Office on Drugs and Crime (UNODC) (2015)).

References

Alvarez, Larry, and Jocelyn Cañas-Moreira. 2015. A Victim-Centered Approach to Sex Trafficking Cases. In *FBI Law Enforcement Bulletin*; November 9. Available online: https://leb.fbi.gov/articles/featured-articles/a-victim-centered-approach-to-sex-trafficking-cases#:~:text=A%20victim-centered%20approach%20provides,adopting%20a%20victim-centered%20strategy (accessed on 4 May 2025).

Andreotti, Vanessa de Oliveira, Sharon Stein, Karen Pashby, and Michelle Nicolson. 2016. Social Cartographies as Performative Devices in Research on Higher Education. *Higher Education Research & Development* 35: 84–99. [CrossRef]

Aronowitz, Alexis A. 2017. *Human Trafficking: A Reference Handbook*. Santa Barbara: ABC-CLIO. [CrossRef]

Baird, Danica. 2019. Changing the Narrative: Sex Trafficking and its Victims. *Brigham Young University Journal of Public Law* 22. Available online: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3463456 (accessed on 28 April 2025).

Beshai, Andrew. 2023. *Protecting the Plea Bargaining Process Against Judicial Breaches*. Washington, DC: American Bar Association. Available online: https://www.americanbar.org/groups/criminal_justice/publications/criminal-justice-magazine/2024/spring/protecting-plea-bargaining-process-against-judicial-breaches/ (accessed on 28 April 2025).

Bowen, Glenn A. 2009. Document Analysis as a Qualitative Research Method. *Qualitative Research Journal* 9: 27–40. [CrossRef]

Bungo, Larissa. 2023. *Scammers Impersonate Well-Known Companies, Recruit for Fake Jobs on LinkedIn and Other Job Platforms*; Washington, DC: Federal Trade Commission. Available online: https://consumer.ftc.gov/consumer-alerts/2023/08/scammers-impersonate-well-known-companies-recruit-fake-jobs-linkedin-and-other-job-platforms (accessed on 29 April 2025).

Burke, Lauren, Liam Hamama, and Marti Flacks. 2023. *Cyber Scamming as a New Destination for Human Trafficking Victims*. Washington, DC: Center for Strategic and International Studies (CSIS). Available online: https://www.csis.org/analysis/cyber-scamming-new-destination-human-trafficking-victims (accessed on 19 July 2024).

Canadian Centre to End Human Trafficking. 2023. Coerced Debt: The Financial Abuse of Survivors of Human Trafficking in Canada. Available online: https://www.canadiancentretoendhumantrafficking.ca/coerced-debt-the-financial-abuse-of-survivors-of-human-trafficking-in-canada/ (accessed on 29 April 2025).

Center for Substance Abuse Treatment. 2014. *Trauma-Informed Care in Behavioral Health Services*; Treatment Improvement Protocol (TIP) Series, No. 57; Rockville: Substance Abuse and Mental Health Services Administration.

Center for Survivor Agency and Justice (CSAJ). 2022. Legal Strategies to Address Coerced Debt. Part 4 of the Consumer Rights Screening Tool Series. October. Available online: https://csaj.org/wp-content/uploads/2022/10/CSAJ-CCD_Part-4_Legal-Strategies-to-Address-Coerced-Debt.pdf (accessed on 1 May 2025).

Charmaz, Kathy. 2006. *Constructing Grounded Theory: A Practical Guide Through Qualitative Analysis*. London: Sage Publications.

Charmaz, Kathy. 2014. *Constructing Grounded Theory*, 2nd ed. London: Sage Publications.

Cockbain, Ella, and Kate Bowers. 2019. Human Trafficking for Sex, Labour and Domestic Servitude: How Do Key Trafficking Types Compare and What Are Their Predictors? *Crime, Law and Social Change* 72: 9–34. [CrossRef]

Commodity Futures Trading Commission (CFTC). 2024. CFTC Charges 14 in $1 Billion Digital Asset Fraud Scheme. March 27. Available online: https://www.cftc.gov/PressRoom/PressReleases/8908-24 (accessed on 3 August 2024).

Consumer Financial Protection Bureau (CFPB). 2019. Reporting of Suspected Elder Financial Exploitation by Financial Institutions: An Update to the 2016 Advisory and Recommendations. July. Available online: https://www.consumerfinance.gov/data-research/research-reports/reporting-suspected-elder-financial-exploitation-financial-institutions-update-2016-advisory-and-recommendations/ (accessed on 30 November 2024).

Consumer Financial Protection Bureau (CFPB). 2022. I'm a Victim of Trafficking. How Can I Block Items from My Credit Report That Are the Result of Trafficking? Available online: https://www.consumerfinance.gov/ask-cfpb/im-a-victim-of-trafficking-how-can-i-block-items-from-my-credit-report-that-are-the-result-of-trafficking-en-2127 (accessed on 30 November 2024).

Consumer Financial Protection Bureau (CFPB). 2024. Consumer Reporting Regulation V Final Rule. Available online: https://www.consumerfinance.gov/rules-policy/final-rules/consumer-reporting-regulation-v/ (accessed on 18 October 2024).

Criminalisation of Migration and the Importance of 'Firewalls'. 2017. Women in Migration Network. Available online: https://womeninmigration.org/wp-content/uploads/2017/06/Berlin-2017_6-Criminalisation-firewalls.pdf (accessed on 5 September 2024).

Criminal Record Relief for Trafficking Survivors. 2023. Polaris. Available online: https://polarisproject.org/wp-content/uploads/2023/04/Criminal-Record-Relief-for-Trafficking-Survivors-by-Polaris.pdf (accessed on 4 September 2024).

Davy, Deanna. 2022. *Economic Reintegration of Trafficking Survivors in Albania: A Qualitative Study of the Experiences of Survivors in Accessing and Frontline Professionals in Providing Economic Reintegration Support*. Tirana: UNICEF Albania and IDRA. Available online: https://www.unicef.org/albania/media/5356/file/Economic%20reintegration%20of%20trafficking%20survivors%20in%20Albania.pdf (accessed on 12 August 2024).

Deck, Cary, Salar Jahedi, and Roman Sheremeta. 2017. The Effects of Different Cognitive Manipulations on Decision Making. March 27. Available online: https://bpb-us-e2.wpmucdn.com/sites.utdallas.edu/dist/8/1090/files/2022/03/cary_deck_paper.pdf (accessed on 4 September 2024).

Dove, Martina. 2024. Scam Techniques in Pig Butchering Scams: Case Study. May 15. Available online: https://ssrn.com/abstract=5015196 (accessed on 31 March 2025).

Europol. 2023. Money Muling: Public Awareness and Prevention Guide. Available online: https://www.europol.europa.eu/operations-services-and-innovation/public-awareness-and-prevention-guides/money-muling (accessed on 4 May 2025).

Europol. 2024. Crackdown on Money Mule Service Providers Laundering over EUR 10 Million. May 31. Available online: https://www.europol.europa.eu/media-press/newsroom/news/crackdown-money-mule-service-providers-laundering-over-eur-10-million (accessed on 12 October 2024).

Federal Bureau of Investigation (FBI). 2023. Money Mules. Available online: https://www.fbi.gov/how-we-can-help-you/scams-and-safety/common-scams-and-crimes/money-mules (accessed on 4 July 2024).

Federal Bureau of Investigation (FBI). 2024. FBI Washington Field Office Warns of Scam Targeting Chinese Communities in the U.S. May 9. Available online: https://www.fbi.gov/contact-us/field-offices/washingtondc/news/fbi-washington-field-office-warns-of-scam-targeting-chinese-communities-in-the-us (accessed on 14 July 2024).

Federal Government Efforts to Combat Human Trafficking, Office on Trafficking in Persons, Office of the Administration for Children & Families. 2020 July 8. Available online: https://www.state.gov/wp-content/uploads/2020/10/2020-PITF-Report.pdf (accessed on 5 October 2024).

Federal Trade Commission (FTC). 2024a. Paying to Get Paid: Gamified Job Scams Drive Record Losses. December. Available online: https://www.ftc.gov/news-events/data-visualizations/data-spotlight/2024/12/paying-get-paid-gamified-job-scams-drive-record-losses (accessed on 23 February 2025).

Federal Trade Commission (FTC). 2024b. What To Know About Identity Theft. September 2. Available online: https://consumer.ftc.gov/articles/what-know-about-identity-theft (accessed on 2 September 2024).

Financial Action Task Force (FATF). 2018. Professional Money Laundering. July. Available online: https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Professional-Money-Laundering.pdf (accessed on 15 July 2024).

Financial Crimes Enforcement Network (FinCEN). 2014. Guidance on Recognizing Activity that May Be Associated with Human Smuggling and Human Trafficking—Financial Red Flags. September 11. Available online: https://www.fincen.gov/sites/default/files/advisory/FIN-2014-A008.pdf (accessed on 23 July 2024).

Financial Crimes Enforcement Network (FinCEN). 2020. *Advisory on Imposter Scams and Money Mule Schemes Related to Coronavirus Disease 2019 (COVID-19)*; Washington, DC: U.S. Department of the Treasury. Available online: https://www.fincen.gov/sites/default/files/advisory/2020-07-07/Advisory_%20Imposter_and_Money_Mule_COVID_19_508_FINAL.pdf (accessed on 13 July 2024).

Financial Crimes Enforcement Network (FinCEN). 2021. *FinCEN Suspicious Activity Report (SAR) XML Schema User Guide*; Version 1.9. Washington, DC: U.S. Department of the Treasury. Available online: https://bsaefiling.fincen.treas.gov/docs/XMLUserGuide_FinCENSAR.pdf (accessed on 13 September 2024).

Financial Crimes Enforcement Network (FinCEN). 2023a. FinCEN Alert on Prevalent Virtual Currency Investment Scam Commonly Known as Pig Butchering. September 8. Available online: https://www.fincen.gov/sites/default/files/shared/FinCEN_Alert_Pig_Butchering_FINAL_508c.pdf (accessed on 17 August 2024).

Financial Crimes Enforcement Network (FinCEN). 2023b. FinCEN Alert on Human Smuggling along the Southwest Border of the United States. January 13. Available online: https://www.fincen.gov/sites/default/files/shared/FinCEN%20Alert%20Human%20Smuggling%20FINAL_508.pdf (accessed on 29 July 2024).

Freedom United. 2023. The Ties Between Identity Theft and Human Trafficking. Available online: https://www.freedomunited.org/news/the-ties-between-identity-theft-and-human-trafficking/ (accessed on 16 July 2024).

Fu, Zhenglang. 2024. Analysis of 'Pig-Butchering Scam' Type of Network Fraud from the Legal Perspective. November. Available online: https://doi.org/10.54254/2753-7048/2024.BO17841 (accessed on 3 February 2025).

Gallagher, Anne T., and Joy Ngozi Ezeilo. 2015. The UN Special Rapporteur on Trafficking: A Turbulent Decade in Review. *Human Rights Quarterly* 37: 913–40. [CrossRef]

Gordon, Stephanie. 2023. Synthetic identity theft is a type of fraud in which criminals create new identities by piecing together elements of a person's personal information, such as name, date of birth and Social Security number, and combining them with false identifiers. In *Emerging Trends in Fraud Law: What Professionals Need to Know*. Austin: Association of Certified Fraud Examiners (ACFE). Available online: https://www.acfe.com/fraud-resources/fraud-examiner-archives/fraud-examiner-article?s=emerging-trends-in-fraud-law (accessed on 4 May 2025).

Greenbaum, Jordan, and Michele Crawford-Jakubiak. 2010. Child Sex Trafficking and Commercial Sexual Exploitation: Health Care Needs of Victims. *Pediatrics* 126: 566–72. Available online: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2978168/ (accessed on 13 March 2025). [CrossRef] [PubMed]

Group of Experts on Action against Trafficking in Human Beings (GRETA). n.d. Thematic Chapter of the 8th General Report on GRETA's Activities (Covering the Period from 1 January to 31 December 2018). *Assistance to Victims of Human Trafficking*. Available online: https://rm.coe.int/assistance-to-victims-of-thb/1680a521f5 (accessed on 18 December 2024).

Homeland Security Investigations, Immigration and Customs Enforcement (ICE). 2017. Human Trafficking vs Human Smuggling. Cornerstone Report. Available online: https://www.ice.gov/sites/default/files/documents/Report/2017/CSReport-13-1.pdf (accessed on 22 August 2024).

Hossain, Mazeda, Cathy Zimmerman, Melanie Abas, Miriam Light, and Charlotte Watts. 2010. The Relationship of Trauma to Mental Disorders Among Trafficked and Sexually Exploited Girls and Women. *American Journal of Public Health* 100: 2442–49. [CrossRef] [PubMed]

Hussemann, Jeanette, Colleen Owens, Hanna Love, Lilly Yu, Evelyn McCoy, Abbey Flynn, and Kyla Woods. 2018. *Bending Towards Justice: Perceptions of Justice Among Human Trafficking Survivors*; Washington, DC: National Institute of Justice. Available online: https://www.ojp.gov/pdffiles1/nij/grants/251631.pdf (accessed on 1 August 2024).

International Justice Mission. n.d. Forced Scamming. Available online: https://www.ijm.org/our-work/trafficking-slavery/forced-scamming (accessed on 18 December 2024).

International Women's Human Rights Clinic (IWHRC). 2014. *Clearing the Slate: Seeking Effective Remedies for Criminalized Trafficking Victims*. Queens: CUNY School of Law. Available online: https://mvlslaw.org/wp-content/uploads/2017/06/Effective-Remedies-for-Criminalized-Trafficking-Victims-CUNY-2014.pdf (accessed on 22 September 2024).

INTERPOL. 2023. INTERPOL Issues Global Warning on Human Trafficking-Fueled Fraud. June 7. Available online: https://www.interpol.int/en/News-and-Events/News/2023/INTERPOL-issues-global-warning-on-human-trafficking-fueled-fraud (accessed on 2 August 2024).

Johnson, Carrie. 2023. *The Vast Majority of Criminal Cases End in Plea Bargains, a New Report Finds*. Washington, DC: National Public Radio. Available online: https://www.npr.org/2023/02/22/1158356619/plea-bargains-criminal-cases-justice (accessed on 18 August 2024).

Jones, Connor. 2023. That Call Center Tech Scammer Could Be a Human Trafficking Victim. Southport: The Register. Available online: https://www.theregister.com/2023/12/08/human_trafficking_for_cyber_scam/ (accessed on 11 February 2025).

Kiss, Ligia, and Cathy Zimmerman. 2019. Human trafficking and labor exploitation: Toward identifying, implementing, and evaluating effective responses. *PLoS Medicine* 16: e1002740. [CrossRef] [PubMed]

Kreidler, Jim. 2024. *Task Scams Create the Illusion of Making Money*; Washington, DC: Federal Trade Commission. Available online: https://consumer.ftc.gov/consumer-alerts/2024/11/task-scams-create-illusion-making-money (accessed on 30 January 2025).

Legal Aid NYC. n.d. Exploitation Intervention Project. Available online: https://legalaidnyc.org/programs-projects-units/exploitation-intervention-project/ (accessed on 4 September 2024).

Love, Hanna, Jeanette Hussemann, Lilly Yu, Evelyn McCoy, and Colleen Owens. 2018. *Comparing Narratives of Justice. How Survivors, Criminal Justice Stakeholders, and Service Providers Perceive Justice in Human Trafficking Cases*. Washington, DC: Urban Institute. Available online: https://www.urban.org/sites/default/files/publication/97346/comparing_narratives_of_justice_0.pdf (accessed on 9 September 2024).

Mekong Club. n.d. What is Modern Slavery. Available online: https://themekongclub.org/modern-slavery (accessed on 11 June 2024).

Mullin, Lara. 2020. *Emphasizing a Victim-Centered Approach in Human Trafficking Prosecutions*; Washington, DC: National Institute of Justice. Available online: https://nij.ojp.gov/topics/articles/emphasizing-victim-centered-approach-human-trafficking-prosecutions (accessed on 13 August 2024).

Muntarbhorn, Vitit. 2022. *End of Mission Statement by the United Nations Special Rapporteur on the Situation of Human Rights in Cambodia*. Phnom Penh: United Nations Office of the High Commissioner for Human Rights, and United Nations, 2023 footnote 39 Information on File with OHCHR. Available online: https://www.ohchr.org/sites/default/files/documents/countries/kh/2022-08-26/SR-Cambodia-End-of-Mission-Statement.pdf (accessed on 2 October 2024).

National Child Traumatic Stress Network (NCTSN). 2014. The Impact of Polyvictimization in Victims of Human Sex Trafficking. Available online: https://www.nctsn.org/resources/impact-polyvictimization-victims-human-sex-trafficking (accessed on 13 March 2025).

National Human Trafficking Hotline. n.d. Human Trafficking. Available online: https://humantraffickinghotline.org/en/type-trafficking/human-trafficking (accessed on 15 September 2024).

National Human Trafficking Training and Technical Assistance Center. n.d. Common Terminology. Available online: https://nhttac-stage.acf.hhs.gov/soar/eguide/common_terminology (accessed on 12 August 2024).

National Institute of Justice (NIJ). 2021. For Human Trafficking Survivors, Justice Is More About Healing and Preventing Future Trafficking. April. Available online: https://nij.ojp.gov/topics/articles/human-trafficking-survivors-justice-more-about-healing-and-preventing-future (accessed on 1 September 2024).

National Survivor Network. 2016. Impact of Criminal Arrest and Detention on Survivors of Human Trafficking: A National Survivor Survey. December. Available online: https://nationalsurvivornetwork.org/wp-content/uploads/2017/12/VacateSurveyFinal.pdf (accessed on 10 September 2024).

Office for Victims of Crime. 2010. Expanding Services to Reach Victims of Identity Theft and Financial Fraud. Available online: https://www.ovc.ojp.gov/library/publications/expanding-services-reach-victims-identity-theft-and-financial-fraud (accessed on 15 July 2024).

Palmer, Danny. 2022. *These Remote Work Job Scams Promise Easy Money but Aim to Steal Your Savings*. New York: ZDNet. Available online: https://www.zdnet.com/article/these-remote-working-job-scams-promise-easy-money-but-aim-to-steal-your-savings/ (accessed on 25 July 2024).

Petrie-Flom Center for Health Law Policy, Biotechnology, and Bioethics at Harvard Law. 2018. The Intersection of Human Trafficking and Immigration. Available online: https://blog.petrieflom.law.harvard.edu/2018/06/27/the-intersection-of-human-trafficking-and-immigration/ (accessed on 10 August 2024).

PICUM. 2022. Unconditional Access to Services for Undocumented Victims of Crime, Platform for International Cooperation on Undocumented Migrants. Available online: https://picum.org/wp-content/uploads/2022/11/Unconditional-access-to-services-for-undocumented-victims-of-crime_EN.pdf (accessed on 18 August 2024).

Piper, Nicola, Marie Segrave, and Rebecca Napier-Moore. 2015. Editorial: What's in a Name? Distinguishing forced labour, trafficking and slavery. *Anti-Trafficking Review*. [CrossRef]

Podkul, Cezary, and Cindy Liu. 2022. *Human Trafficking's Newest Abuse: Forcing Victims into Cyberscamming*. New York: ProPublica. Available online: https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming (accessed on 5 November 2024).

Polaris. 2018. *On-Ramps, Intersections, and Exit Routes: A Roadmap for Systems and Industries to Prevent and Disrupt Human Trafficking*. Ottawa: Polaris. Available online: https://polarisproject.org/wp-content/uploads/2018/08/A-Roadmap-for-Systems-and-Industries-to-Prevent-and-Disrupt-Human-Trafficking-Financial-Industry.pdf (accessed on 18 November 2024).

Polaris. 2021. Love and Trafficking: How Traffickers Groom & Control Their Victims. February 11. Available online: https://polarisproject.org/blog/2021/02/love-and-trafficking-how-traffickers-groom-control-their-victims/ (accessed on 2 September 2024).

Polaris. 2022. The Credit Repair Process for Survivors: What We Know So Far. August 16. Available online: https://polarisproject.org/blog/2022/08/the-credit-repair-process-for-survivors-what-we-know-so-far/ (accessed on 4 September 2024).

Polaris. 2023. Language Matters: 5 Ways Your Words Impact Trafficking Survivors. January 1. Available online: https://polarisproject.org/blog/2023/01/language-matters-5-ways-your-words-impact-trafficking-survivors/ (accessed on 2 August 2024).

Polaris Project. 2023. *Criminal Record Relief for Trafficking Survivors: Updating Grades and Rubric to Reflect Current Improvements and Changes*. Ottawa: Polaris.

Preble, Kathleen M., Andrea Nichols, and Ashley Cox. 2022. Working With Survivors of Human Trafficking: Results From a Needs Assessment in a Midwestern State. July 1. Available online: https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9257488/ (accessed on 22 July 2024).

Sex Workers Project. 2012. *Vacating Criminal Convictions for Trafficked Persons: A Legal Memorandum*. New York: Urban Justice Center, April, Available online: https://sexworkersproject.org/downloads/2012/20120422-memo-vacating-convictions.pdf (accessed on 13 August 2024).

Survive and Thrive Advocacy Center. n.d. Human Trafficking Terms: What You Need to Know. The Term Survivor Is Used, As Being Helpless and Weak. Available online: https://surviveandthriveadvocacy.org/human-trafficking-terms-what-you-need-to-know/ (accessed on 11 August 2024).

Swedberg, Richard, ed. 2014. *Theorizing in Social Science: The Context of Discovery*. Stanford: Stanford University Press.

The Centre for Social Justice. 2021. New Plan for Immigration Consultation Response—Identifying and Supporting Victims of Modern Slavery and Human Trafficking. Available online: https://www.centreforsocialjustice.org.uk/wp-content/uploads/2021/05/CSJ-NPIC-Response_FINAL.pdf (accessed on 3 August 2024).

The Law Library of Congress. 2022. Available online: https://www.congress.gov/bill/117th-congress/house-bill/8672/text (accessed on 13 July 2024).

The Legal Rights and Needs of Victims of Human Trafficking in the United States. 2015, U.S. Department of Justice, Office of Justice Programs, Office for Victims of Crime. December. Available online: https://ovc.ojp.gov/sites/g/files/xyckuh226/files/media/document/HT_Legal_Rights_Needs_fact_sheet-508.pdf (accessed on 1 September 2024).

The National Human Trafficking Victim Assistance Program. 2024 September 4. Available online: https://www.benefits.gov/benefit/622 (accessed on 4 September 2024).

Thomson Reuters Institute. 2023. *Human Rights Crimes Resource Center*. New York: Thomson Reuters. Available online: https://www.thomsonreuters.com/en-us/posts/human-rights-crimes/thomson-reuters-human-trafficking-resource-center/ (accessed on 4 September 2024).

Toh, Ying Lei. 2024. *Combating Authorized Push Payment Scams in Fast Payment Systems*. Kansas City: Federal Reserve Bank of Kansas City. Available online: https://www.kansascityfed.org/documents/10571/PaymentsSystemResearchBriefing24Toh1115.pdf (accessed on 19 January 2025).

United Nations. 2006. Tool 7.6: Victims Facing Deportation. UNODC Toolkit to Combat Trafficking in Persons: Global Programme Against Trafficking in Human Beings. Available online: https://www.unodc.org/documents/human-trafficking/Toolkit-files/08-58296_tool_7-6.pdf (accessed on 22 August 2024).

United Nations News. 2022. UN Human Rights Experts Urge China to Allow Them 'Full Access'. June 8. Available online: https://news.un.org/en/story/2022/06/1120172 (accessed on 11 December 2024).

United Nations Office of the United Nations High Commissioner for Human Rights (UNOHCHR). 2023. Online Scam Operations and Trafficking into Forced Criminality in Southeast Asia: Recommendations for a Human Rights Response. Available online: https://reliefweb.int/report/world/online-scam-operations-and-trafficking-forced-criminality-southeast-asia-recommendations-human-rights-response (accessed on 22 December 2024).

United Nations Office on Drugs and Crime (UNODC). 2015. Combating Violence Against Migrants: Criminal Justice Measures to Prevent, Investigate, Prosecute and Punish Violence Against Migrants, Migrant Workers and Their Families and to Protect Victims. Available online: https://www.unodc.org/documents/justice-and-prison-reform/UNODC_Combating_Violence_against_Migrants.pdf (accessed on 13 January 2025).

United Nations Office on Drugs and Crime (UNODC). n.d. Protection Under the Protocol Against Trafficking in Persons. Available online: https://www.unodc.org/e4j/zh/tip-and-som/module-8/key-issues/protection-under-the-protocol-against-trafficking-in-persons.html (accessed on 1 February 2025).

UNODC. 2009. International Framework for Action To Implement the Trafficking in Persons Protocol, Table 1. Prosecution. p. 20. Available online: https://www.unodc.org/documents/human-trafficking/Framework_for_Action_TIP.pdf (accessed on 5 October 2024).

UNOHCHR. 2000. Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organized Crime. Available online: https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons (accessed on 22 August 2024).

U.S. Committee for Refugees and Immigrants (USCRI). 2023. Practice Guidance on the Debt Bondage Repair Act. November 7. Available online: https://refugees.org/practice-guidance-on-the-debt-bondage-repair-act/ (accessed on 22 November 2024).

U.S. Congress. 2000. Victims of Trafficking and Violence Protection Act of 2000. Pub. L. No.106-386. 8 U.S.C. §1101, §7101, 114 Stat. 1464. Available online: https://www.govinfo.gov/content/pkg/PLAW-106publ386/pdf/PLAW-106publ386.pdf (accessed on 22 November 2024).

U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation (ASPE). 2007. Addressing the Needs of Victims of Human Trafficking: Challenges, Barriers, and Promising Practices. ASPE Issue Brief. Available online: https://aspe.hhs.gov/sites/default/files/migrated_legacy_files//42821/ib.pdf (accessed on 4 September 2024).

U.S. Department of State. 2014. The Use of Forced Criminality: Victims Hidden Behind the Crime. Available online: https://2009-2017.state.gov/documents/organization/233938.pdf (accessed on 19 August 2024).

U.S. Department of State. 2023. Trafficking in Persons Report 2023: Introduction and Additional Pages. June. Available online: https://www.state.gov/wp-content/uploads/2023/05/Trafficking-in-Persons-Report-2023_Introduction-Additional-Pagesv4_FINAL.pdf (accessed on 4 September 2024).

U.S. Department of State Office to Monitor and Combat Trafficking in Persons. 2023a. Engaging Survivors of Human Trafficking—Survivor Engagement in the Anti-Trafficking Field: History, Lessons Learned, and Looking Forward. Available online: https://2021-2025.state.gov/engaging-survivors-of-human-trafficking-2/ (accessed on 4 September 2024).

U.S. Department of State Office to Monitor and Combat Trafficking in Persons. 2023b. Protecting Victims of Trafficking: The Non-Punishment Principle. Available online: https://www.state.gov/wp-content/uploads/2023/12/Protecting-Victims-of-Trafficking-The-Non-Punishment-Principle.pdf (accessed on 16 August 2024).

U.S. Department of State Office to Monitor and Combat Trafficking in Persons. 2023c. Understanding Human Trafficking. Available online: https://www.state.gov/what-is-trafficking-in-persons/ (accessed on 16 August 2024).

U.S. Office for Victims of Crime (OVC). n.d. *About Human Trafficking*; Washington, DC: U.S. Department of Justice, Office of Justice Programs. Available online: https://ovc.ojp.gov/program/human-trafficking/about-human-trafficking (accessed on 4 September 2024).

Van der Watt, Marcel, and Beatri Kruger. 2017. Exploring 'Juju' and Human Trafficking: Towards a Demystified Perspective and Response. *Society in Transition* 48: 70–86. [CrossRef]

Walts, Katherine Kaufka, Meghan Scholnick, and Joanne Curley. 2023. *Perpetrators or Victims? The U.S. Response to the Forced Criminality of Children*. Washington, DC: American Bar Association, August 8, Available online: https://www.americanbar.org/groups/litigation/resources/newsletters/childrens-rights/perpetrators-victims-us-response/ (accessed on 24 February 2025).

Wheaton, Elizabeth M., Edward J. Schauer, and Thomas V. Galli. 2010. *Economics of Human Trafficking*. Geneva: International Organization for Migration. Available online: https://www.amherst.edu/media/view/247221/original/Economics+of+Human+Trafficking.pdf (accessed on 15 August 2024).

World Population Review. 2024. Human Trafficking Statistics by State. Available online: https://worldpopulationreview.com/state-rankings/human-trafficking-statistics-by-state (accessed on 13 July 2024).

Zimmerman, Cathy, and Charlotte Watts. 2003. *WHO Ethical and Safety Recommendations for Interviewing Trafficked Women*. Geneva: World Health Organization.

Zimmerman, Cathy, and Ligia Kiss. 2017. Human trafficking and exploitation: A global health concern. *PLoS Medicine* 14: e1002437. [CrossRef] [PubMed]